

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF TEXAS  
BROWNSVILLE DIVISION**

**UNITED STATES OF AMERICA**

**vs.**

**KEVIN LYNDEL MASSEY  
Defendant**

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**Criminal No. 1:14-cr-00876-01**

**DEFENDANT’S UNOPPOSED MOTION TO REVEAL THE DEAL**

TO THE HONORABLE JUDGE OF SAID COURT:

COMES NOW, **Kevin Lyndel Massey**, Defendant in the above-entitled and numbered cause, by and through his attorney of record and files this Defendant’s Unopposed Motion To Reveal The Deal, and as grounds for such would respectfully show as follows:

**I.**

That there is another defendant indicted together in this cause, along with other possible informants or witnesses who assisted and/or participated with law enforcement officers and the defendants in the investigation of this cause.

**II.**

That if the prosecution has either made, promised or implied that it will make concessions to either defendants/informers/or other witnesses in order to induce their testimony, the defense has the right to know the nature of the concessions to show bias, and such is vital to prove credibility.

III.

That if no such concessions have been made up to this time, that the prosecution be ordered to reveal such when and if it occurs.

WHEREFORE, PREMISES CONSIDERED, defendant prays that the court order the prosecution to reveal the exact nature of all negotiations and discussions with other defendants, witnesses, informants, or other persons concerning any promises, concessions, or expectations expressed or implied which could or might be expected to occur in the future in the event said people cooperate with the prosecution.

Respectfully submitted,

By: /s/ Edmund K. Cyganiewicz  
EDMUND K. CYGANIEWICZ  
Fed. Id. No. 2243  
State Bar No. 05300050  
1000 E. Madison St.  
Brownsville, Texas 78520  
Telephone No. (956) 541-5995  
Facsimile No. (956) 542-4475

**CERTIFICATE OF SERVICE**

I hereby certify that on this the 15<sup>th</sup> day of December, 2014, a true and correct copy of the foregoing Defendant's Unopposed Motion To Reveal The Deal, was electronically filed with the Clerk of Court using the CM/ECF system which will send notification of such filing to all parties.

By: /s/ Edmund K. Cyganiewicz  
EDMUND K. CYGANIEWICZ

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**CERTIFICATE OF CONFERENCE**

I, the undersigned, hereby certify that I have conferred with, U.S. Attorney William F. Hagen regarding the foregoing Defendant's Unopposed Motion To Reveal The Deal, and he is unopposed to this motion.

By: /s/ Edmund K. Cyganiewicz  
EDMUND K. CYGANIEWICZ